

**IN THE UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: JAMES SIMMONS and :  
KEISHA SIMMONS :  
Debtors : No: 19-01991-RNO  
: Chapter 13  
:

**STIPULATION RESOLVING OBJECTION TO  
DEBTORS' MOTION TO INCUR POST-PETITION DEBT**

Now comes Debtors and Creditor, Wilmington Savings Fund Society, FSB, not in its individual capacity, but solely as Trustee of NYMT Loan Trust I (the "Creditor"), to stipulate to the resolution of Association's *Objection to Debtors' Motion to Incur Post-Petition Debt*, and in support thereof avers:

1. Debtors filed a Motion to Incur Post-Petition Debt on or about March 4, 2021 to borrow certain sums ("the subject loan").
2. Association timely objected to said Motion on March 17, 2021.
3. Through discussions between the parties, Debtors and Creditor have agreed to the following stipulation to be entered of record and approved by this Honorable Court as follows:
  - A. Debtors shall ensure that the loan of Creditor shall be paid in full subject to proper payoff on closing of Debtors' refinanced mortgage loan; and
  - B. Creditor shall withdraw its *Objection to Debtors' Motion to Incur Debt*.
4. The undersigned represent that they have authority to enter into the present stipulation.

5. The undersigned request to have this stipulation entered as an order of court.

KML Law Group, P.C.

/s/Rebecca A. Solarz, Esq.

REBECCA A. SOLARZ, ESQ.  
Attorney for Creditor

ARM LAWYERS

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PATRICK J. BEST, ESQ.  
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